

# **EXHIBIT B**

## Exhibit Objections (Ex. B)

Ex. No.	Description of Exhibits	Objection(s)
1	Plaintiff's Complaint (ECF No. 1)	None
2	Defendants' Answer (ECF No. 127)	None
3	Defendants' Redline Proposed First Amended Answer (ECF No. 250-9, Ex. BB, ECF No. 196-2)	None
4	Defendants' First Amended Answer (ECF No. 210)	None
5	Strickland Official EDR Grievance and Cover Email (ECF No. 248-2; Bates No. US500-072 <sup>1</sup> )	Cond.; 801/802
6	Strickland EDR Disqualification Request and Cover Email (ECF No. 248-2; Bates No. US597-98)	Cond.; 801/802
7	Strickland EDR Mediation Supplement and Exhibits (ECF No. 248-2; Bates No. US64-109)	Cond.; 801/802
8	Strickland EDR Renewed Disqualification Request and Cover Email (ECF No. 248-2; Bates No. US1498-1502)	Cond.; 801/802
9	2013 EDR Plan (ECF No. 248-3; Bates No. US4536-64)	None
10	Defendants' Objections and Responses to Plaintiff's Second Set of Requests for Admission <sup>2</sup> (ECF No. 248-4)	None
11	Draft EDR Report of Investigator/Counselor and Cover Email (ECF No. 248-5; Bates No. US1654-61)	Cond.; 602; 701; 801/802; E
12	Final EDR Report and Exhibits of Investigator/Counselor and Cover Email (ECF No. 248-5; Bates No. US2293, 1244-1311)	Cond.; 602; 701; 801/802; E
13	EDR Coordinator Disciplinary Action Letter (ECF No. 248-5; Bates No. US7561-62)	Cond.; 602; 701; 801/802; E
14	Draft EDR Counseling Letter (ECF No. 248-5; Bates No. US1312-15)	Cond.; 602; 701; 801/802; E
15	Final EDR Counseling Letter (ECF No. 254-4; Bates No. US4264-67)	Cond.; 602; 701; 801/802; E
16	Anthony Martinez (Federal Defender) Deposition (ECF No. 248-6; ECF No. 250-14; ECF No. 255-4)	Cond.; 602; 701; 801/802; E; UT (Not Designated by Defendants)
17	Jill Langley (Judicial Integrity Officer) Deposition (ECF No. 255-12)	Cond.; 602; 701; 801/802; UT (Not Designated by Defendants)
18	Hon. Roger Gregory (Chief Judge/ EDR Presiding Officer) Deposition (ECF No. 255-2)	Cond.; 602; 701; 801/802; E; UT (Not Designated by Defendants)
19	Ed Smith (Circuit Mediator) Deposition (ECF No. 248-9; ECF No. 255-7)	Cond.; 602; 701; 801/802; E; UT (Not Designated by Defendants)
20	Nancy Dunham (AO FEOO) Deposition (ECF No. 255-15 <sup>3</sup> )	Cond.; 602; 701; 801/802; UT (Not Designated by Defendants)
21	Heather Beam (EDR Investigator/Counselor) Deposition (ECF No. 248-11; ECF No. 250-4; ECF No. 255-15)	Cond.; 602; 701; 801/802; E; UT (Not Designated by Defendants)
22	James Ishida (Circuit Executive/ EDR Coordinator) Deposition (ECF No. 248-12; ECF No. 255-3)	Cond.; 602; 701; 801/802; E; UT (Not Designated by Defendants)
23	Caryn Strickland (Plaintiff) Deposition (ECF No. 248-13)	Cond.; 801/802; UT (Not Designated by Defendants)
FN1	Correct citation to "Bates No. US500-07"	
FN2	Exhibit 10 should include ECF No. 248-4 in its entirety.	
FN3	Correct citation to "ECF No. 255-14"	

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24	June 2018 J.P. Davis (First Assistant) Email Notes (ECF No. 248-14; Bates No. US5890-91)	Cond.; 404/405; 602; 608/609/611; 701; 801/802; potentially privileged
25	Text Messages between J.P. Davis (First Assistant) and Erin Taylor (Trial Unit Chief) (ECF No. 248-14; Bates No. US5777-82, 5807-14, 5881-89; ECF No. 248-15, US6852-68)	Cond.; 404/405; 602; 608/609/611; 701; 801/802; potentially privileged
26	July 2018 J.P. Davis (First Assistant) Mentoring Email (ECF No. 248-14; Bates No. US6088)	Cond.; 404/405; 602; 608/609/611; 701; 801/802
27	July 2018 J.P. Davis (First Assistant) PIP Email (ECF No. 248-14; Bates No. US3974-75)	Cond.; 404/405; 602; 608/609/611; 701; 801/802
28	Text Messages between J.P. Davis (First Assistant) and Anthony Martinez (Federal Defender) (ECF No. 248-14; Bates No. US6035-36)	Cond.; 801/802
29	July 2018 Holly Dixon (Administrative Assistant to the Defender) Team Leader Notes with Cover Email (ECF No. 248-14; Bates No. US7411-15)	Cond.; 602; 701; 801/802
30	August 2018 James Ishida (Circuit Executive/ EDR Coordinator) AO Interference Email (ECF No. 248-14; Bates No. US2558-61)	Cond.; 602; 701; 801/802; E
31	Heather Beam (EDR Investigator/Counselor) Investigation Notes (ECF No. 248-14; Bates No. US5947-51, 6226-36)	Cond.; 602; 701; 801/802; E
32	Emails between Heather Beam (EDR Investigator/Counselor) and J.P. Davis (First Assistant) (ECF No. 248-14; Bates No. US1357-60, 1353-54, 4014-15, 1343-47)	Cond.; 602; 701; 801/802; E
33	Emails between Heather Beam (EDR Investigator/Counselor), J.P. Davis (First Assistant), and Anthony Martinez (ECF No. 248-14; Bates No. US2822-23, 2820)	Cond.; 602; 701; 801/802; E
34	Emails between J.P. Davis (First Assistant) and James Ishida (Circuit Executive/ EDR Coordinator) (ECF 255-6; Bates No. US3020-24)	Cond.; 602; 701; 801/802; E
35	December 2018 Significant Event Log (ECF No. 248-14; Bates No. US4807)	Cond.; 602; 701; 801/802
36	January 2019 Heather Beam (EDR Investigator/Counselor) Disqualification Email (ECF No. 248-14; Bates No. US1382-83)	Cond.; 801/802
37	Emails between Caryn Strickland (Plaintiff) and James Ishida (Circuit Executive/ EDR Coordinator) (ECF No. 248-14; Bates No. US1635-39; ECF No. 248-15; Bates No. US519-21, 1533-35, 4714)	Cond.; 602; 701; 801/802; E
38	Emails between J.P. Davis (First Assistant) and Josh Carpenter (Appellate Chief) (ECF No. 248-15; Bates No. US6852-68 <sup>4</sup> )	Cond.; 404/405; 602; 608/609/611; 701; 801/802
39	July 2018 Significant Event Log (ECF No. 248-15; Bates No. US3985)	Cond.; 602; 701; 801/802; potentially privileged
40	Emails between James Ishida (Circuit Executive/ EDR Coordinator) and Anthony Martinez (Federal Defender) (ECF No. 248-15; Bates No. US615-18)	Cond.; 602; 701; 801/802; E
41	EDR Witness List (ECF No. 248-15; Bates No. US590-92)	Cond.; 404/405; 602; 608/609/611; 701; 801/802
FN4	Correct citation to "Bates No. US2794-97"	

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42	March 2019 Heather Beam (EDR Investigator/Counselor) "True Pain" Email (ECF No. 248-14 <sup>5</sup> ; Bates No. US4025-26)	Cond.; 801/802
43	Email between Caryn Strickland (Plaintiff) and Hon. Roger Gregory (Chief Judge/ EDR Presiding Officer) (ECF No. 248-15; Bates No. US1536)	Cond.; 801/802
44	Jill Langley (Judicial Integrity Officer) Notes (ECF No. 248-15; Bates No. US5445-47)	Cond.; 602; 701; 801/802; E
45	Emails between Caryn Strickland (Plaintiff) and Jill Langley (Judicial Integrity Officer) (ECF No. 248-15; Bates No. US2207-08)	Cond.; 602; 701; 801/802; E
46	Emails between James Ishida (Circuit Executive/ EDR Coordinator) and AO OGC Attorney (ECF No. 248-15; Bates No. US2739 0001)	Cond.; 701; 801/802; E
47	August 2018 Backdated AO Form 51 (ECF No. 248-15; Bates No. US3411-12)	Cond.; 801/802
48	AO DOCS Manual Federal Defender Organization Job Descriptions (ECF No. 248-15; Bates No. US4956-58, 4968-74)	None
49	Federal Judicial Center "Preventing Workplace Harassment for Court Staff" Resource (ECF No. 248-15; Bates No. US4956-58, 4968-74 <sup>6</sup> )	None
50	Emails between Caryn Strickland (Plaintiff) and Nancy Dunham (AO FEOO) (ECF No. 248-15; Bates No. US1056-59)	Cond.; 801/802
51	Excerpts of Audio Recordings of Heather Beam (EDR Investigator/Counselor), James Ishida (Circuit Executive/ EDR Coordinator), and Ed Smith (Circuit Mediator) (ECF No. 248 Exh. O [Conventional Filing, ECF No. 173]; ECF 255-11; Bates No. US7615-16, 7647-49, 7654-56, 7675, 7693-96, 7709, 7730-31, 7733-34, 7989-90, 7992, 8044-45, 8068-69, 8077, 8089-90, 8103-04, 8129, 8201-02, 8206-08, 8219-21, 8263, 8283-84, 8336, 8386, 8470-71, 8516-17, 8588 [Defendants' Transcripts])	Cond.; 404/405; 602; 608/609/611; 701; 801/802
52	FDO EDR Complaints (ECF 248-16; Defendants' Objections and Responses to Plaintiff's Third Set of Interrogatories, Bates No. US5384-89, 7448-49, 7426-47, 7451-53, 7421-25, 7513-16, 7544-47, 7542, 7529-30, 7454-56, 7508-12, 7504-07, 5551-58, 4008-10)	Cond.; 602; 701; 801/802; E; potentially privileged
53	Thomas Expert Report and Declaration (ECF 248-17)	Cond.; 801/802
54	March 2023 Albrecht Expert Report and Declaration (ECF 248-18)	Cond.; 801/802
55	White Expert Report (ECF 250-1)	Cond.; 602; 701/702/703/704; 801/802; 1001-1004; E
56	Guide to Judiciary Policy Chapter 4 (ECF 250-2)	None
57	WDNC FDO EDR Plan (ECF 250-3)	None
58	181005_1434 Heather Beam (EDR Investigator/Counselor) Audio Transcript (ECF No. 250-5; Bates No. US7731, 7863)	Cond.; 404/405; 608/609/611; 801/802
59	January 2023 Kolsky Discovery Letter (ECF No. 250-6)	None
FN5	Correct citation to "ECF No. 255-15"	
FN6	Correct citation to "Bates No. US7017-21"	

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Ex. No.	Description of Exhibits	Objection(s)
60	January 2023 and March 2023 Strickland Discovery Emails (ECF No. 250-8)	Cond.; 404/405; 608/609/611; 801/802
61	Defendants' First Amended Answer (ECF No. 250-9)	None
62	Defendants' Objections and Responses to Plaintiff's Requests for Production (ECF No. 250-10)	None
63	190226_1153 Ed Smith (Circuit Mediator) Audio Transcript (ECF No. 250-11; Bates No. US8470-71, 8507-22, 8527-28)	Cond.; 404/405; 602; 608/609/611; 701; 801/802; E
64	190308_1019 Ed Smith (Circuit Mediator) Audio Transcript (ECF No. 250-12; Bates No. US8618-19, 8691-98)	Cond.; 404/405; 602; 608/609/611; 701; 801/802; E
65	2019 Employment Dispute Resolution Interpretative Guide & Handbook (ECF No. 250-13)	None
66	Other EDR Complaint Investigation Report Attachment (ECF No. 250-16)	Cond.; 602; 701; 801/802; potentially privileged
67	190117_1621 James Ishida (Circuit Executive/ EDR Coordinator) Audio Transcript (ECF No. 255-1; Bates No. US8201-02, 8212-23, 8263)	Cond.; 404/405; 602; 608/609/611; 701; 801/802; E
68	180905_1042 James Ishida (Circuit Executive/ EDR Coordinator) Audio Transcript (ECF No. 255-5; Bates No. US7615-16, 7654-56, 7667, 7670-71, 7675)	Cond.; 404/405; 602; 608/609/611; 701; 801/802; E
69	Emails between J.P. Davis (First Assistant) and William Moormann (Administrative Officer) (ECF No. 255-6; Bates No. US2944)	Cond.; 602; 701; 801/802
70	Emails between James Ishida (Circuit Executive/ EDR Coordinator) and Ed Smith (Circuit Mediator) (ECF No. 255-8; Bates No. US1322-24, 201)	Cond.; 602; 701; 801/802
71	190109_1116 James Ishida (Circuit Executive/ EDR Coordinator) Audio Transcript (ECF No. 255-9; Bates No. US8151-52, 8154-58, 8164-74, 8187)	Cond.; 404/405; 602; 608/609/611; 701; 801/802; E
72	Lessons From a Circuit Mediator Slideshow (ECF No. 255-10; Bates No. US3580-602, 201)	Cond.; 602; 701; 801/802; E
73	180913_1633 AO FEOO Staff Attorney Audio Transcript (ECF No. 255-13; Bates No. US8782-83, 8813-23, 8848)	Cond.; 404/405; 602; 608/609/611; 701; 801/802; E
74	181109_1540 Heather Beam (EDR Investigator/Counselor) Audio Transcript (ECF No. 255-16; Bates No. US8044-45, 8066-69, 8077)	Cond.; 404/405; 602; 608/609/611; 701; 801/802; E
75	Albrecht Expert Report Supporting Documentation (ECF 255-17)	Cond.; 801/802
76	180809_1344 Anthony Martinez (Federal Defender) Audio Transcript (Bates No. US7563-64, 7565-66, 7573-603)	Cond.; 404/405; 602; 608/609/611; 701; 801/802
77	180918_0845 James Ishida (Circuit Executive/ EDR Coordinator) Audio Transcript (Bates No. US7693-94, 7696-709, 7709)	Cond.; 404/405; 602; 608/609/611; 701; 801/802; E
78	181005_1434 Heather Beam (EDR Investigator/Counselor) Audio Transcript (Bates No. US7730-31, 7735, 7887, 7961-63, 7973-75, 7992)	Cond.; 404/405; 602; 608/609/611; 701; 801/802; E
79	181109_1540 Heather Beam (EDR Investigator/Counselor) Audio Transcript (Bates No. US8044-45, 8050-53, 8058-59, 8061-63, 8065-66, 8068-69, 8071-73, 8074-75, 8077)	Cond.; 404/405; 602; 608/609/611; 701; 801/802; E
80	Emails between Heather Beam (EDR Investigator/Counselor) and Caryn Strickland (Plaintiff) (ECF No. 60-4; Bates No. US344-46, 431-32, 1428)	Cond.; 801/802
81	18116_1042 Audio Recording	<i>Exhibit Withdrawn By Plaintiff</i>

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82	Emails between James Ishida (Circuit Executive/ EDR Coordinator) and Caryn Strickland (Plaintiff) (ECF No. 60-4; Bates No. US476, 1611-14, 1640, 1958-60, 2049-50)	Cond.; 602; 701; 801/802; E
83	181127_1711 James Ishida (Circuit Executive/ EDR Coordinator) Audio Transcript (Bates No. US8089-90, 8092-94, 8097-104, 8104-08, 8110-24, 8129)	Cond.; 404/405; 602; 608/609/611; 701; 801/802; E
84	Counseling Extension Order (ECF No. 60-4; Bates No. US2047)	None
85	190109_1116 James Ishida (Circuit Executive/ EDR Coordinator) Audio Transcript (Bates No. US8151-52, 8185, 8187)	Cond.; 404/405; 602; 608/609/611; 701; 801/802; E
86	190117_1621 James Ishida (Circuit Executive/ EDR Coordinator) Audio Transcript (Bates No. US8201-16, 8222-29, 8235-37, 8250-57, 8263)	Cond.; 404/405; 602; 608/609/611; 701; 801/802; E
87	Plaintiff's Request for Mediation (ECF No. 60-3; Bates No. US3138-39)	None
88	190207_1056 Ed Smith (Circuit Mediator) Audio Transcript (Bates No. US8283-86, 8294-96, 8306, 8317, 8321-32, 8336, 8357-58, 8365, 8382, 8386)	Cond.; 404/405; 602; 608/609/611; 701; 801/802; E
89	190212_1848 Ed Smith (Circuit Mediator) Audio Transcript (Bates No. US8417-42, 8427-28, 8445-47, 8449-54, 8456)	Cond.; 404/405; 602; 608/609/611; 701; 801/802; E
90	Emails between James Ishida (Circuit Executive/ EDR Coordinator) and Cooper Strickland (Plaintiff) (ECF No. 60-4; Bates No. US754-55)	Cond.; 602; 701; 801/802; E
91	190226_1153 Ed Smith (Circuit Mediator) Audio Transcript (Bates No. US8470-71, 8473-75, 8480-87, 8489-91, 8532-59, 8564-66, 8588)	Cond.; 404/405; 602; 608/609/611; 701; 801/802; E
92	190308_1019 Ed Smith (Circuit Mediator) Audio Transcript (Bates No. US8618-19, 8674-75, 8700)	Cond.; 404/405; 602; 608/609/611; 701; 801/802; E
93	190504_1621 <sup>7</sup> James Ishida (Circuit Executive/ EDR Coordinator) Audio Transcript (Bates No. US8745-46, 8754-59, 8760-71)	Cond.; 404/405; 602; 608/609/611; 701; 801/802; E
94	Emails between William Moormann (Administrative Officer) and AO HR Officials (Bates No. US2705-08)	Cond.; 602; 701; 801/802; E
95	Defendants' March 2023 and April 2023 Privilege Log for Defendants' Production	None
96	WDNC FDO 2024 AFD Job Postings	None
97	AOWeb and UVM Articles regarding Caryn Devins Strickland's "dream job" as a federal public defender	None
98	July 2023 Albrecht Expert Report and Declaration	Cond.; 801/802
99	181221_0937 FDO all-staff meeting Audio Transcript (Bates No. US8144-8150)	Cond.; 404/405; 608/609/611; 801/802
100	Ethics advice provided by NC Bar restricting Plaintiff's ability to practice in federal court within the Fourth Circuit	Cond.; 801/802
FN7	Correct citation to "190507_1621"	